



Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022
+1 212 909 6000

MEMO ENDORSED

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July 17, 2015

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Highline Capital Management, LLC vs. High Line Venture Partners, L.P. et al.*, 15 Civ. 660 (VEC)

Dear Judge Caproni:

Counsel for the Plaintiff and Counterclaim Defendant Highline Capital Management, LLC and for the Defendant and Counterclaim Plaintiff High Line Venture Partners, L.P. as well as the Defendants High Line Venture Partners II, L.P., High Line Venture Partners GP, LLC, High Line Venture Partners GP II, LLC, and Shana Fisher (collectively “Defendants”), have conferred, and we write to submit a jointly proposed amended trial schedule. The proposed amended schedule, set out below, does not change the trial or final pre-trial conference dates, although it does suggest moving the currently scheduled July 31, 2015 pre-trial conference until after the completion of all fact discovery. The parties jointly propose adjusting the schedule to accommodate scheduling previously noticed depositions of a number of party and third party witnesses that could not be scheduled prior to the current close of fact discovery. Additional time is necessary to complete the depositions due, in part, to the availability of the witnesses, and the parties may need to use the deposition testimony in preparation of expert reports. The parties jointly propose the following adjusted schedule:

July 20, 2015	Close of Fact Discovery
August 19, 2015	Deadline to Complete Previously Noticed Fact Depositions
August 21, 2015	Joint Status Letter to Court

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September 4, 2015	Pre-Trial Conference
September 8, 2015	Exchange Expert Reports
October 5, 2015	Exchange Expert Rebuttal Reports
October 27, 2015	Close of Expert Discovery
November 6, 2015	Exchange Trial Exhibits
November 13, 2015	Exchange Objections to Exhibits; File Motions in Limine; Exchange Deposition Designations; Findings of Fact, Conclusions of Law, Optional Pre-Trial Memo
November 23, 2015	File Opposition to Motions in Limine; Exchange Objections to Deposition Designations; File Joint Pre-Trial Order
December 1, 2015	Final Pre-Trial Conference
December 7, 2015	Trial

Defendants have consented to the submission of this letter and proposed amended schedule.

Respectfully submitted,

/s/ Matthew E. Fishbein
Matthew E. Fishbein

cc: All Parties (via ECF) Request GRANTED. The conference scheduled for July 31, 2015, is ADJOURNED to September 4, 2015, at 10:00 a.m. The deadline for expert discovery is ADJOURNED to October 27, 2015. The parties shall file their proposed findings of fact and conclusions of law, optional pretrial memorandum, and motions in limine, if any, no later than November 13, 2105. The parties' joint pretrial order and oppositions to motions in limine, if any, shall be filed no later than November 23, 2015.

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE
July 20, 2015